

1 JOSEPH Y. HONG, ESQ.  
State Bar No. 005995  
2 HONG & HONG LAW OFFICE  
1980 Festival Plaza Drive, Suite 650  
3 Las Vegas, Nevada 89135  
Telephone No.: (702) 870-1777  
4 Facsimile No.: (702) 870-0500  
E-mail: [yosuphonglaw@gmail.com](mailto:yosuphonglaw@gmail.com)  
5 Attorney for LKimmy, Inc.

6  
7 UNITED STATES DISTRICT COURT  
8 DISTRICT OF NEVADA  
9

10 LKIMMY, INC.,

11 Plaintiff,

12 vs.

13 BANK OF AMERICA, N.A., a national banking  
14 association; IL KIM aka JULIUS KIM, an  
individual; DOES I through X and ROE  
15 BUSINESS ENTITIES I through X, inclusive,

16 Defendants.  
17

Case No.: 2:20-CV-02184-RFB-VCF

**STIPULATION AND ORDER TO  
EXTEND DEADLINES ON  
DEFENDANT, BANK OF AMERICA,  
N.A.'S, MOTION TO DISMISS [ECF  
NO. 4]**

**(FIRST REQUEST)**

18 COME NOW, Plaintiff, LKIMMY, INC. ("LKimmy"), and Defendant, BANK OF  
19 AMERICA, N.A. ("Bana") (collectively hereinafter the "Parties"), by and through their  
20 undersigned counsel, hereby stipulate and agree as follows:  
21

22 1. Defendant, Bana, filed its motion to dismiss LKimmy's complaint on December 7,  
23 2020 [ECF No. 4].

24 2. LKimmy's response to Defendant, Bana's, motion to dismiss LKimmy's complaint  
25 is due on or before December 21, 2020.

26 3. Defendant, Bana's, reply to LKimmy's response is due on or before December 28,  
27 2020.  
28

4. The Parties stipulate and agree to allow LKimmy an additional fifteen (15) days, up to and including **Tuesday, January 5, 2021**, to file a response to Defendant, Bana's, motion to dismiss LKimmy's complaint.

5. The Parties also stipulate and agree to allow Defendant, Bana, up to and until **Tuesday, January 12, 2021**, to file its reply to LKimmy's response.

This is the first request for an extension of these deadlines. This request is not made to cause any undue delay or prejudice to any party.

DATED: December 18, 2020.

**HONG & HONG LAW OFFICE**

/s/ Joseph Y. Hong

JOSEPH Y. HONG, ESQ.

State Bar No. 005995

1980 Festival Plaza Drive, Suite 650

Las Vegas, Nevada 89135

Attorney for LKimmy, Inc.

DATED: December 18, 2020.

**WILSON, ELSER, MOSKOWITZ,  
EDELMAN & DICKER LLP**

/s/ Chad C. Butterfield

CHAD C. BUTTERFIELD, ESQ.

State Bar No. 010532

300 South Fourth Street, 11<sup>th</sup> Floor

Las Vegas, Nevada 89101

Attorney for Bank of America, N.A.

**ORDER**

IT IS SO ORDERED.

IT IS SO ORDERED:



RICHARD F. BOULWARE, II  
United States District Judge

DATED this 21st day of December, 2020.

**CERTIFICATE OF SERVICE**

I certify that I am an employee of Joseph Y. Hong, Esq., and that on this 18<sup>th</sup> day of December, 2020, I served a true and correct copy of the foregoing **STIPULATION AND ORDER TO EXTEND DEADLINES ON DEFENDANT, BANK OF AMERICA, N.A.'S, MOTION TO DISMISS [ECF NO. 4]** by electronic transmission through the Court's electronic filing system upon each party in this case who is registered and listed as an electronic case filing user with the Clerk.

By: /s/ Debra L. Batesel

An employee of Joseph Y. Hong, Esq.